

SCOTT A. WILSON

ATTORNEY AT LAW
Practice of Labor and Employment Law

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November 22, 2019

Farah Z. Qureshi
Associate Executive Secretary
National Labor Relations Board
1015 Half Street S.E.
Washington, DC 20570

Re: Wismettac Asian Foods, Inc.
Cases 21-CA-207463, et al. and 21-RC-204759

Dear Ms. Qureshi,

Please be advised the undersigned and this law firm represent Wismettac Asian Foods, Inc. (Respondent) in the above referenced matter. I am in receipt of your correspondence dated November 22, 2019, regarding Counsel for the General Counsel's Motion to Sever Case 21-RC-204759 from Cases 21-CA-207463, 21-CA-208128, 21-CA-209337, 21-CA-213978, 21-CA-219153, and 21-CA-212285, filed with the Board on November 15, 2019. In your letter, you state the motion is unopposed, however, on November 21, 2019, this office filed a notice of intent to file opposition (see Attachment 1). Therefore, the undersigned respectfully requests that you reverse the granting of the motion and allow Respondent to file its opposition. Thank you.

Respectfully,



Scott A. Wilson, Esq.
Attorney for Wismettac Asian Foods, Inc.

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CERTIFICATE OF SERVICE

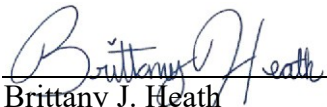
I, Brittany J. Heath, declare and state as follows:

1. I am at least 18 years of age, not a party to this action. I am employed at the Law Offices of Scott A. Wilson, which is located in San Diego County, California. My business address is 433 G Street, Suite 203, San Diego, CA 92101. My e-mail address is sawfrontoffice@pepperwilson.com.
2. I hereby certify that a copy of Wismettac Asian Foods, Inc.'s **LETTER TO THE OFFICE OF THE EXECUTIVE SECURITY**, regarding Cases 21-CA-207463, 21-CA-208128, 21-CA-209337, 21-CA-213978, 21-CA-219153, 21-CA-212285, and 21-RC-204759, has been submitted by E-Filing to the National Labor Relations Board, Office of the Executive Secretary in Washington DC, on November 22, 2019.
3. On November 22, 2019, I served by e-mail, a copy of the document described in item 2 on the parties as follows:

NAME OF PERSON SERVED	ELECTRONIC SERVICE ADDRESS
Elvira T. Pereda, Esq. Counsel for the General Counsel National Labor Relations Board, Region 21	elvira.pereda@nlrb.gov
Thomas Rimbach, Esq. Counsel for the General Counsel National Labor Relations Board, Region 21	thomas.rimbach@nlrb.gov
Renée Q. Sánchez, Esq. Counsel for the Union, Teamsters Local 630	rqs@sdlaborlaw.com
Rolando Lopez	cateoria@yahoo.com

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Diego, California on November 22, 2019.

By: 
Brittany J. Heath
Assistant to Scott A. Wilson

Attachment

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD**

WISMETTAC ASIAN FOODS, INC.

and

INTERNATIONAL BROTHERHOOD
OF TEAMSTERS, LOCAL 630

and

ROLANDO LOPEZ, an Individual

and

INTERNATIONAL BROTHERHOOD
OF TEAMSTERS, LOCAL 630

Cases 21-CA-207463
 21-CA-208128
 21-CA-209337
 21-CA-213978
 21-CA-219153

Case 21-CA-212285

Case 21-RC-204759

**WISMETTAC ASIAN FOODS, INC.’S NOTICE OF INTENT TO FILE OPPOSITION
TO COUNSEL FOR THE GENERAL COUNSEL’S MOTION TO SEVER**

On Friday, November 15, 2019, Counsel for the General Counsel (General Counsel) filed and served a Motion to Sever¹ with the National Labor Relations Board (the Board), requesting that the Board sever the representation case (Case No. 21-RC-204759) from the unfair labor practice cases (Case Nos. 21-CA-207463, 21-CA-208128, 21-CA-209337, 21-CA-213978, 21-CA-219153, and 21-CA-212285).

Wismettac Asian Foods, Inc. (Respondent) received the General Counsel’s Motion to Sever on November 15, 2019 at 7:19 p.m. (PST). Unless the Board orders otherwise, Respondent shall file its opposition to the General Counsel’s Motion to Sever on Monday, November 25, 2019.

¹ “COUNSEL FOR THE GENERAL COUNSEL’S MOTION TO SEVER CASE 21-RC-204759 FROM CASES 21-CA-207463, 21-CA-208128, 21-CA-209337, 21-CA-213978, 21-CA-219153, AND 21-CA-212285.”

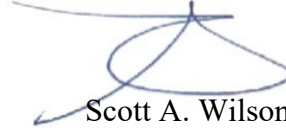
Such filing date is necessary as Respondent has been busy with ongoing litigation matters, including preparing for interviews with Board Attorney Irma Hernandez and the taking of affidavits in NLRB cases 21-CA-250459 and 21-CA-250686, which includes the production of substantial documents.

The General Counsel has indicated to Respondent that they have no objection to this notification. Counsel for Respondent has not heard from Renée Sánchez, counsel for the Charging Party, at the time of the filing of this Notice of Intent.

Dated: November 21 2019

Respectfully Submitted By:

LAW OFFICES OF SCOTT A. WILSON

A handwritten signature in blue ink, appearing to be "Scott A. Wilson", is written over the printed name.

Scott A. Wilson, Esq. (SBN 73187)
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Attorney for Respondent
WISMETTAC ASIAN FOODS, INC.

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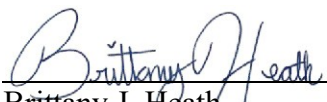
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2. I hereby certify that a copy of **WISMETTAC ASIAN FOODS, INC.'S NOTICE OF INTENT TO FILE OPPOSITION TO COUNSEL FOR THE GENERAL COUNSEL'S MOTION TO SEVER**, in Cases 21-CA-207463, 21-CA-208128, 21-CA-209337, 21-CA-213978, 21-CA-219153, 21-CA-212285, and 21-RC-204759, has been submitted by E-Filing to the National Labor Relations Board, Office of the Executive Secretary in Washington DC, on November 21, 2019.
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Executed at San Diego, California on November 21, 2019.

By: 
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Assistant to Scott A. Wilson